State and Local Fiscal Recovery Fund (SLFRF) Compliance and Reporting for Non-Entitlement Cities (NEUs)

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Iowa League of Cities Webinar

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What is the SLFRF?

- Provided funding (ARPA funds) to cities to respond to COVID-19 pandemic
- Funds provided to cities on a per capita basis
- All funding received needed to be obligated before the end of 2024
- All funding must be spent before the end of 2026
- Compliance report must be submitted by non-entitlement cities (NEUs) annually by April 30th through 2027

Final Rule: Ineligible Use of Funds

- Funding may not be used directly or indirectly to reduce property taxes
- Deposits into pension funds are prohibited
- Cannot be used to repay debt service
- May not be used to for judgements or settlements
- Use on projects prior to March 2021 are ineligible

Final Rule: Eligible Use of Funds

Standard Allowance for Revenue Loss Up to $10 Million

- Assumption all recipients experienced a loss due to COVID-19
- Cities can use the funding received for “government services” which provides the most flexibility on use of funds: **depending on use, funding would still be subjected to competitive bidding and procurement as necessary**
- By taking the standard allowance the reporting process is simpler / streamlined
- Most cities in Iowa took the standard allowance

How Has Your City Spent or Obligated to Spend the SLFRF / ARPA Funds?

Final Rule: Obligating and Expending Funds

Funds needed to be obligated by December 31, 2024, and expended by December 31, 2026.

- Obligated means under a contract executed by the city and the contractor / vendor
- A Resolution allocating (budgeting) the funds does not meet the the obligation requirement
- **Any remaining ARPA funds not obligated by the deadline must be returned to the Department of Treasury.**

Obligating and Expending Funds

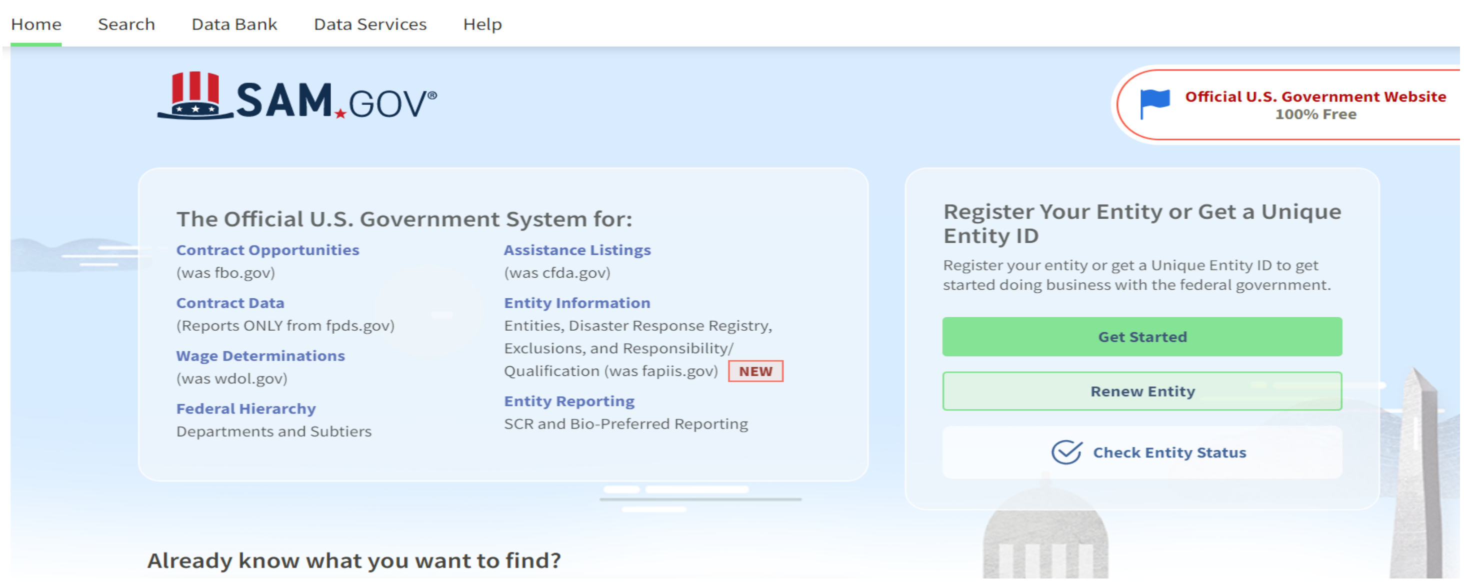
What Is an Obligation?

- From the Final Rule: “an order placed for property and services and entering into contracts, subawards, and similar transactions that require payment.”
- Be mindful of the definition of obligation. It is not just budgeting the money, a municipality must go further and create a contract, subaward or similar transaction requiring payment prior to the end of 2024.

SLFRF Compliance Reporting

SAM.gov

SAM is the official government-wide database to register with in order to do business with the U.S. government



SAM.gov

- SAM.gov accounts must be renewed annually
- To complete the ARPA SLFRF compliance report, SAM.gov registration must be up to date, and the city's UEI number may be needed
- UEI is a "Unique Entity Identifier" 12-digit number, and can be looked up on the SAM.gov website
- If you are having difficulty with SAM registration, registration renewal, or other assistance needed, visit https://sam.gov/content/help, or call the Federal Service Desk at (866) 606-8220.

SAM.gov Help Videos

- Tutorial for new SAM.gov users:
  https://www.youtube.com/watch?v=Zfr7poeQfSg

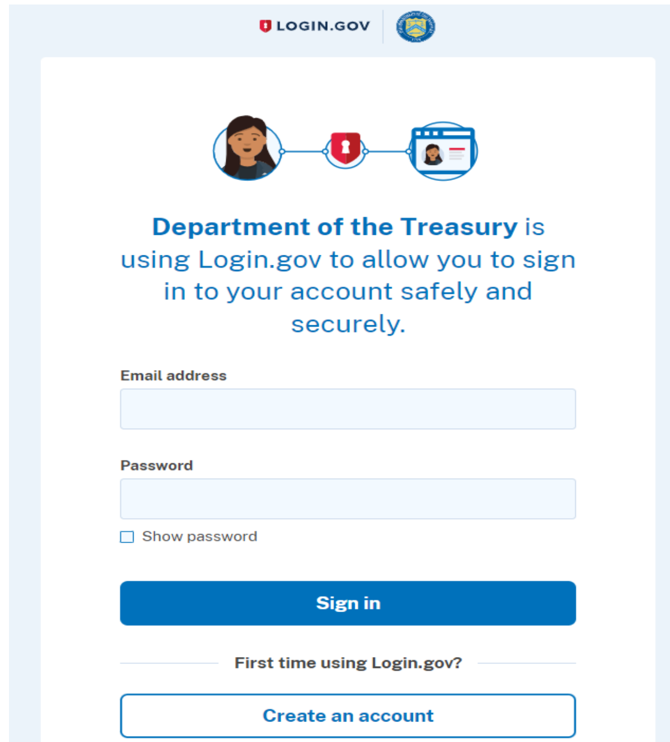
- How to get UEI without completing registration process and providing documentation to validate your entity:
  https://www.youtube.com/watch?v=C87wSCYKTcE

- Navigating the registration process:
  https://www.youtube.com/watch?v=YZ6LM69niuk

Accessing Treasury Portal at Login.gov

Link to address Treasury Portal at Login.gov:

portal.treasury.gov/compliance

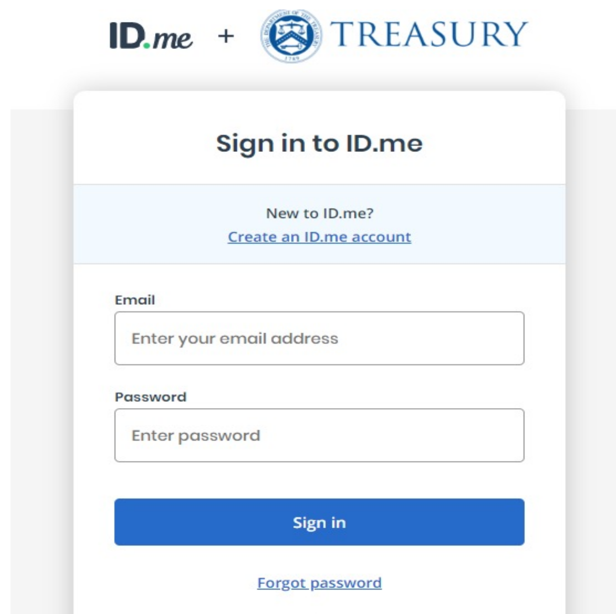


Login.gov

- Users may sign in using an existing account or choose the create a new account option
- Creating a new account is a one-time process that includes verifying your email address, creating a password, and receiving an authentication code. You will need the city’s UEI number to create a new account. The entire process should take a few minutes

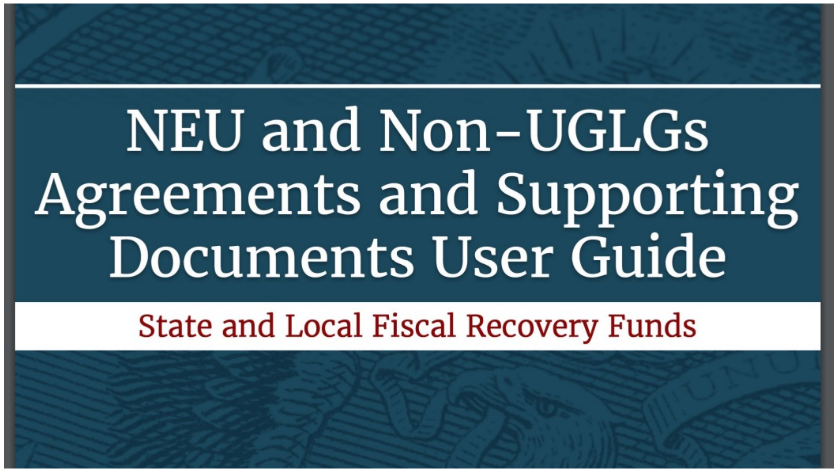
Accessing the Treasury Portal Using ID.me

Users that already have access to Treasury's portal using ID.me are *not* required to use Login.gov and can continue accessing their reporting records through ID.me.



NEU User Guide

Quick reference guide which contains several helpful tips which include reporting guidance, assigning roles, project and expenditure reports, etc.: https://home.treasury.gov/system/files/136/NEU-Non-UGLG-Agreements-and-Supporting-Documents.pdf



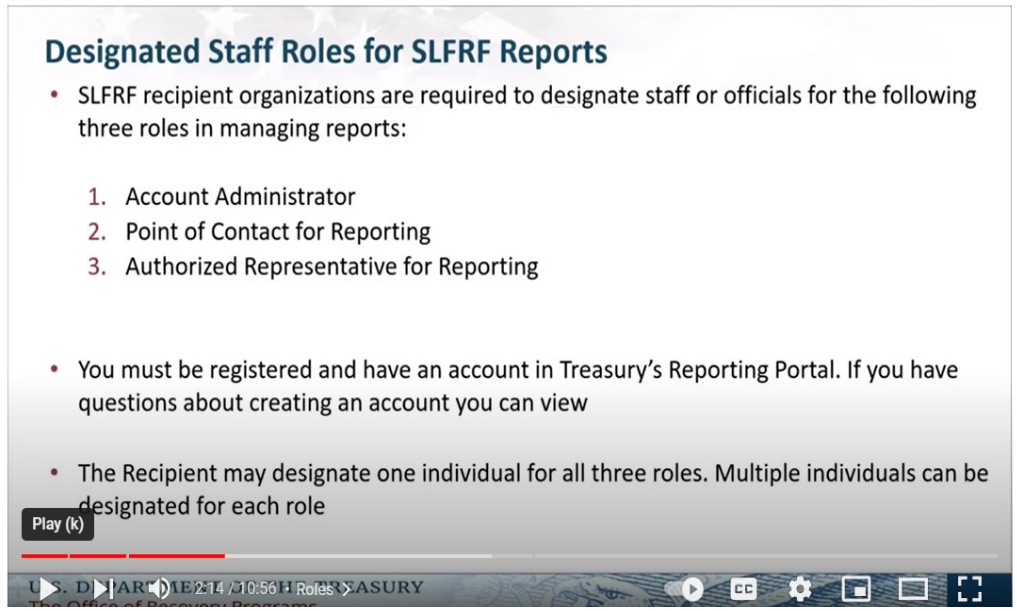
Staff Roles for Reporting

Account Administrator: Maintains the names and contact information for each role for reporting. The Administrator can also view and submit reports. It is recommended that a second Administrator role be assigned in the event of staff changes.

Point of Contact for Reporting: Primary contact for receiving official Treasury notifications about reporting.

Authorized Representative for Reporting: Responsible for certifying and submitting official reports on behalf of the SLFRF award recipient.

Link to the Treasury tutorial webinar to assign roles: https://www.youtube.com/watch?v=w7vbi94rVDI

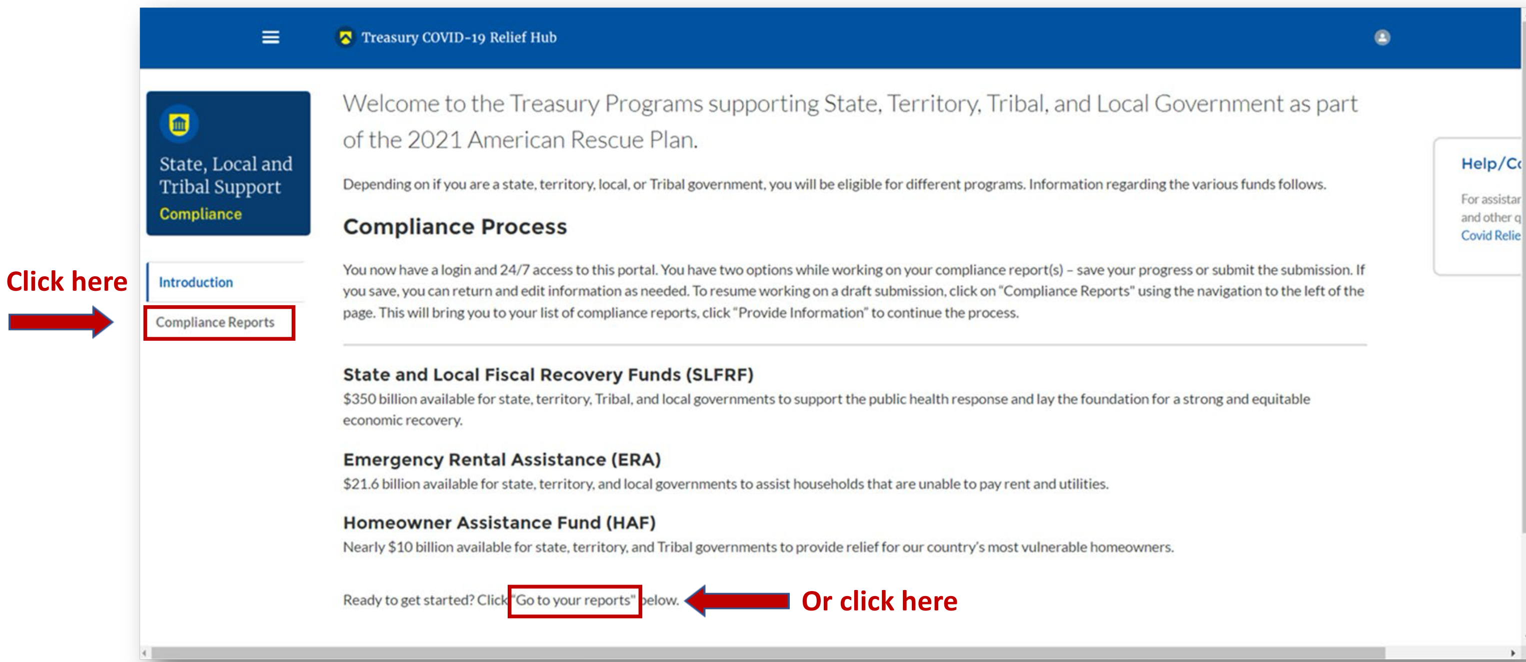


Guidance to Complete Compliance Report

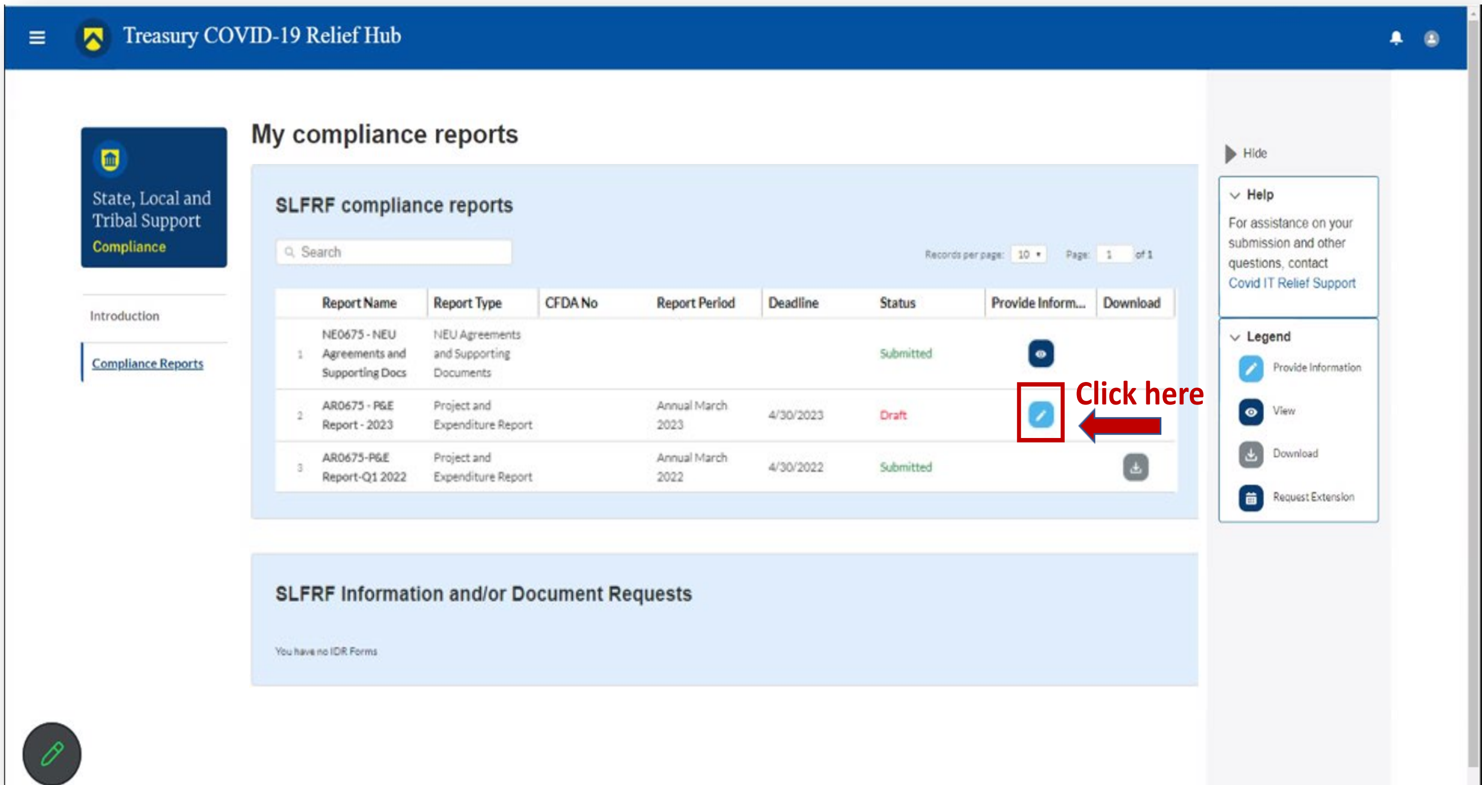
- Reporting portal opens in early April and reports must be submitted by April 30 annually (through 2027): **log in early**
- The reporting period starts April 1 of the prior year and ends March 31 of current year

Completing the Compliance Report: Standard Allowance Instructions

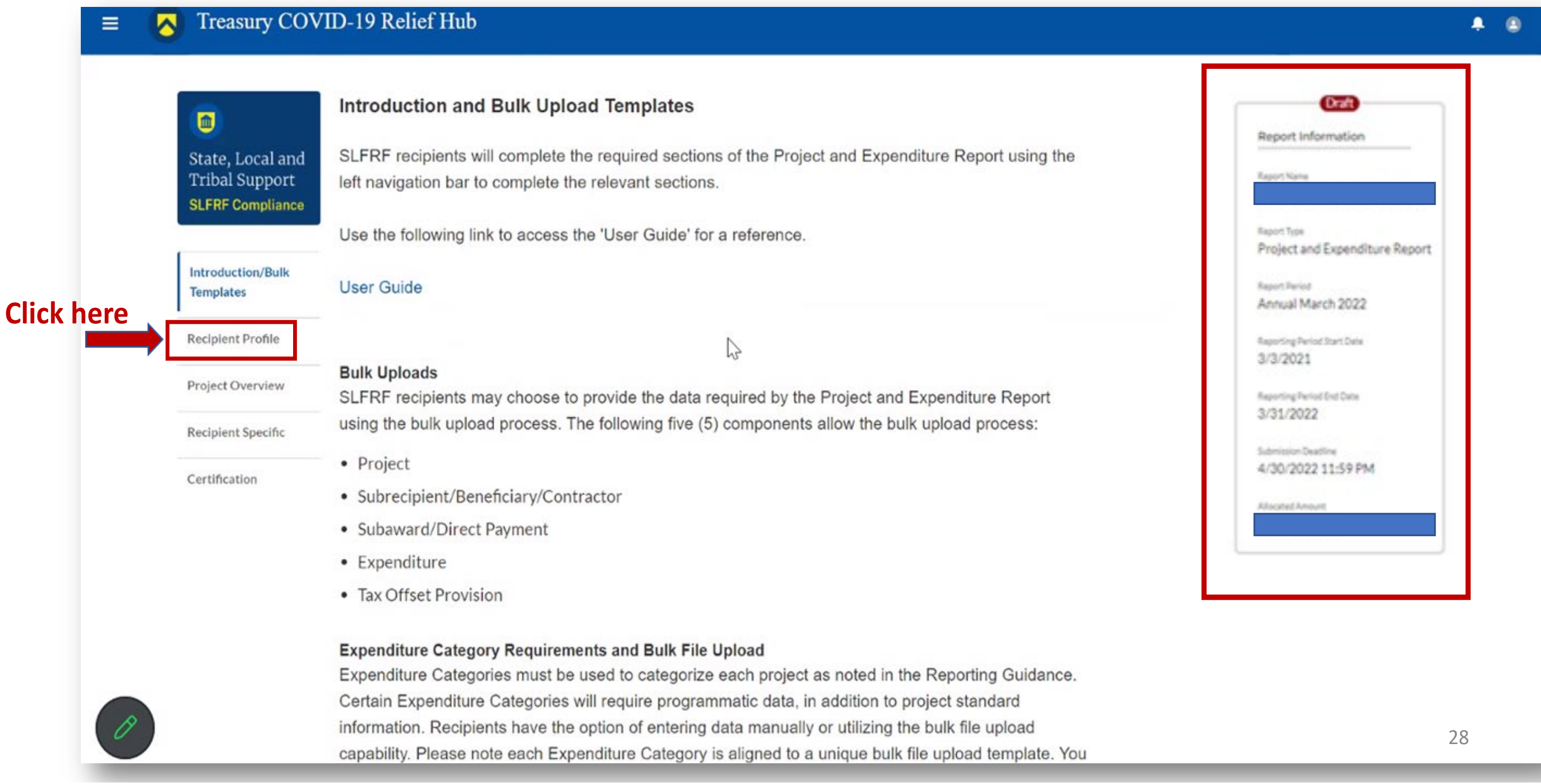
Select “**Compliance Reports**” from the sidebar menu or click “**Go to My Reports**” in the lower part of the page.



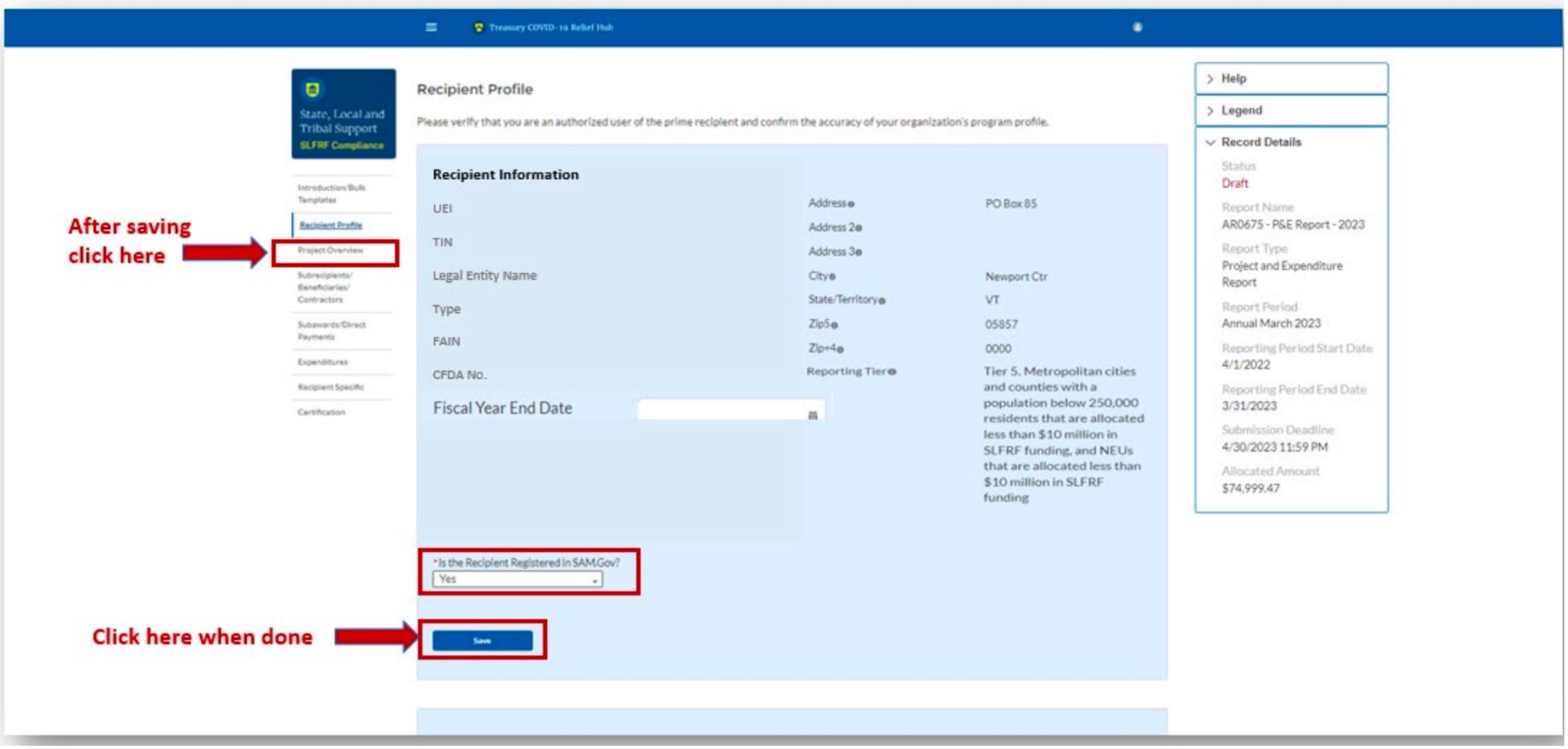
You will arrive at the "**My Compliance Reports**" page.
Look for the "**SLFRF Compliance Reports**" section.
You will see a Project and Expenditure Report for 2023 with a Status of "**Draft**." Next to it is a blue pencil icon – click it.



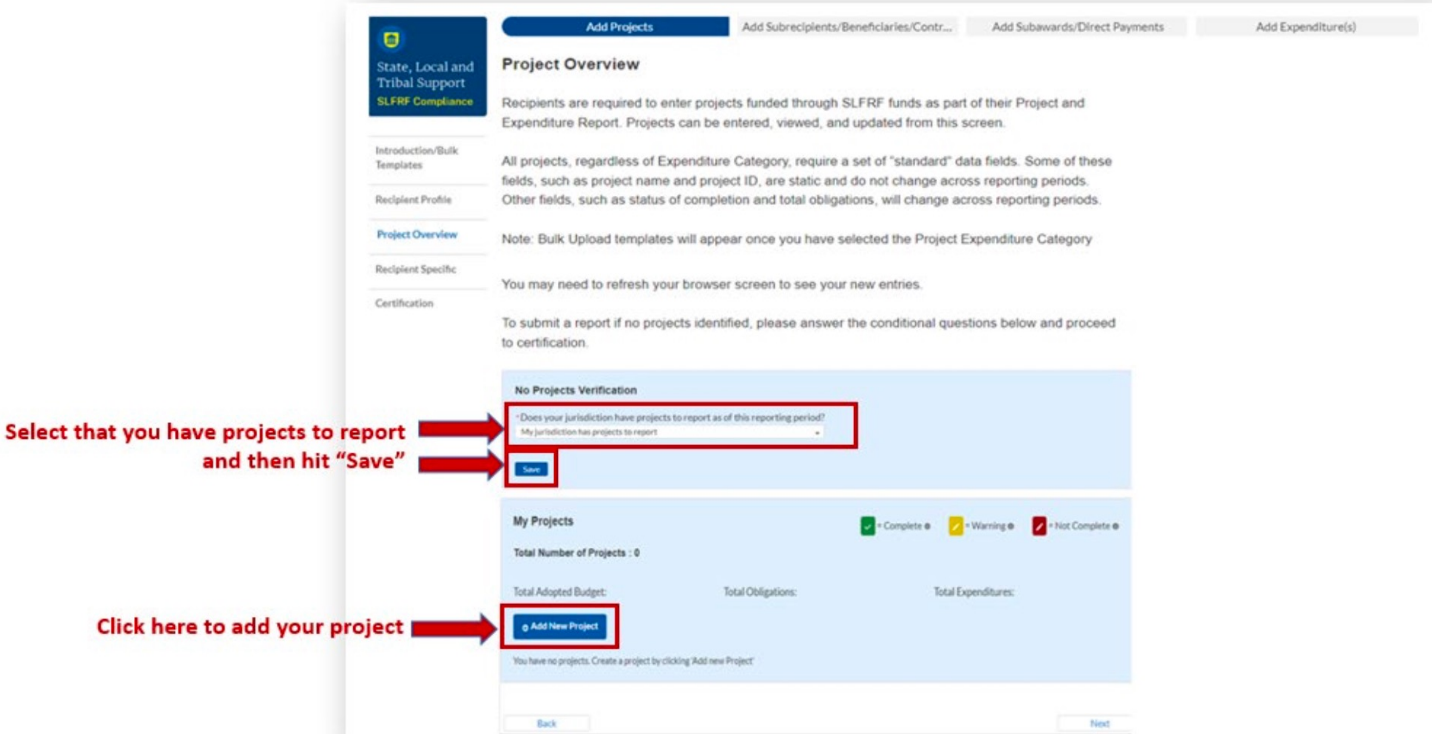
You will arrive at the “**Introduction and Bulk Upload Templates**” page.
From the sidebar menu, find “**Recipient Profile**” and select it.
Please note the box outlined in red on the right side of the screen. It contains details for your entity, including your total ARPA award amount (all funds received to date) at the bottom under “**Allocation Amount**.”



You will arrive at the "***Recipient Profile***" page. Review the "***Recipient Information***" section to ensure it contains the correct information and then enter the required fields. Click "***Save***" when done and then select "**Project Overview**" from the sidebar menu.



In the "***Project Overview***" page, you will find the "***No Projects Verification***" section. It contains the question "***Does your jurisdiction have projects to report as of this reporting period?"*** Select ***"My jurisdiction has projects to report***" and hit "***Save."*** In the "***My Projects***" section, select "***Add New Project***."



Update to Project Overview Page

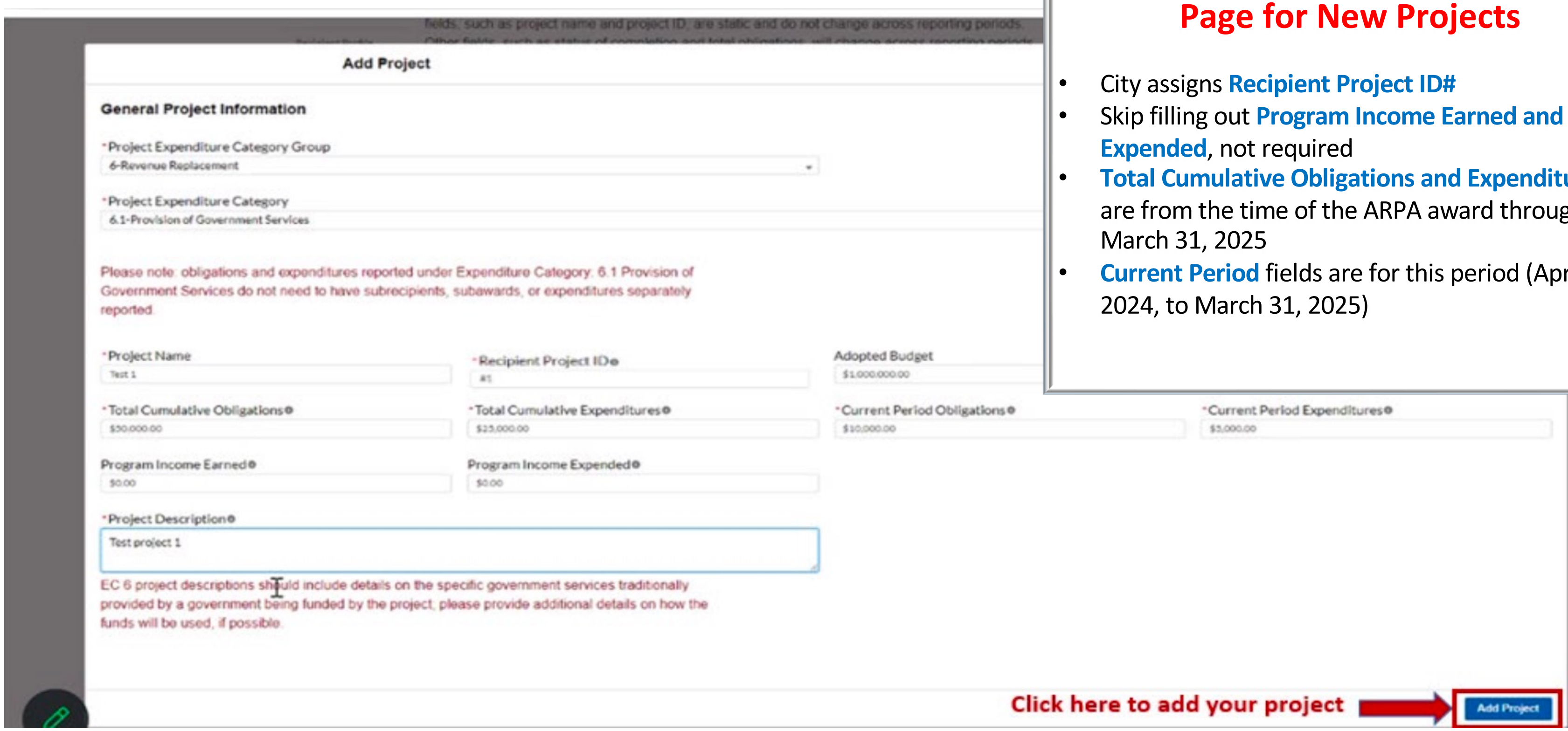
You will be asked the following question:

Be sure to answer "Yes", if you do not answer this question, you will receive an error message when attempting to certify and submit the report.

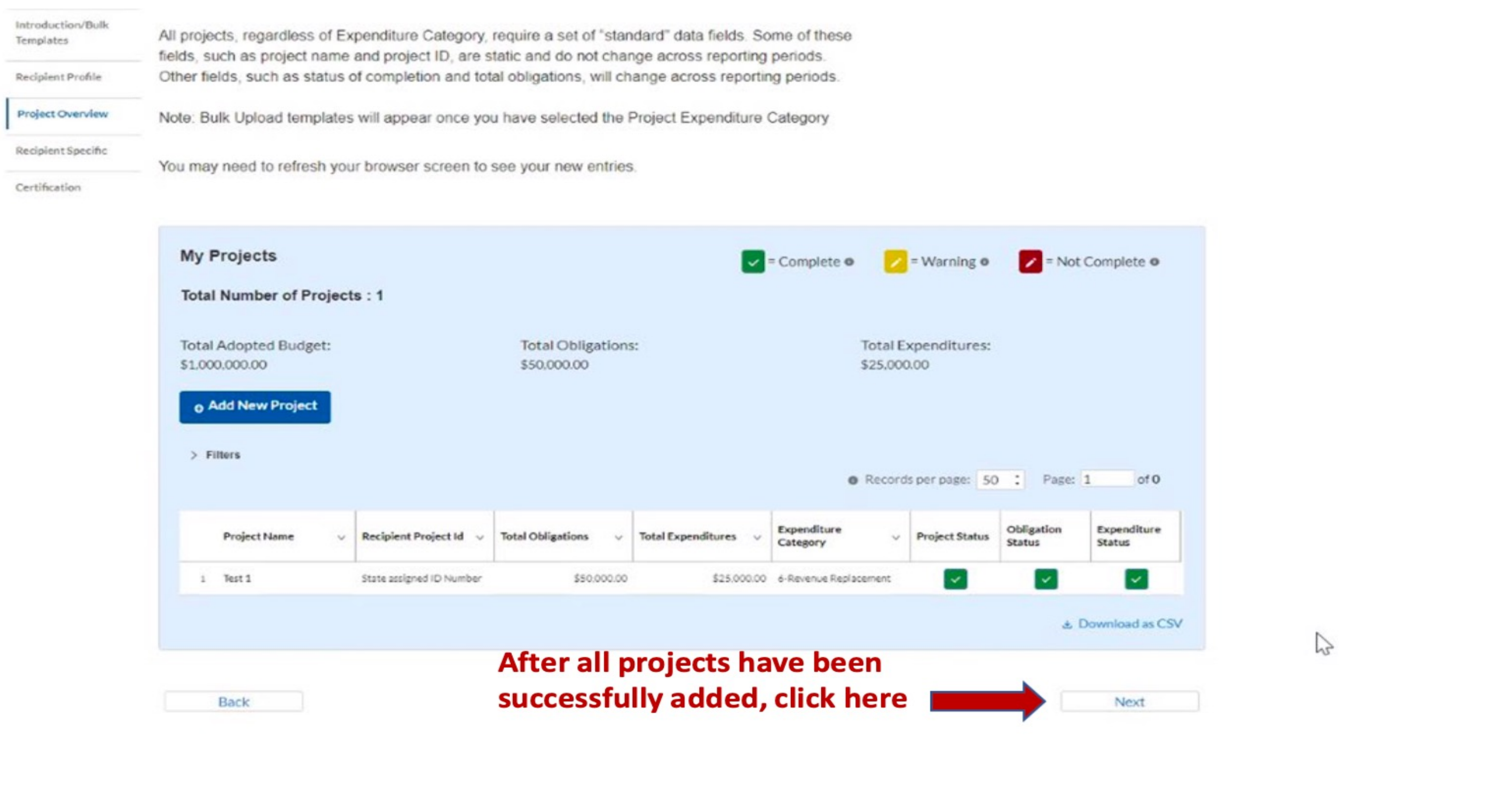
Because the standard allowance for revenue loss was elected, all reporting of ARPA expenditures will be under **Expenditure Category Group 6 – Revenue Replacement**, using **Expenditure Category 6.1 Provision of Government Services.** When you have entered all the required fields, click **"Add Project."** If necessary, continue adding additional projects for this reporting period (4/1/2023 – 3/31/2024).

Notes to Complete Fields on this Page for New Projects

- City assigns **Recipient Project ID#**
- Skip filling out **Program Income Earned and Expended**, not required
- **Total Cumulative Obligations and Expenditures** are from the time of the ARPA award through March 31, 2025
- **Current Period** fields are for this period (April 1, 2024, to March 31, 2025)

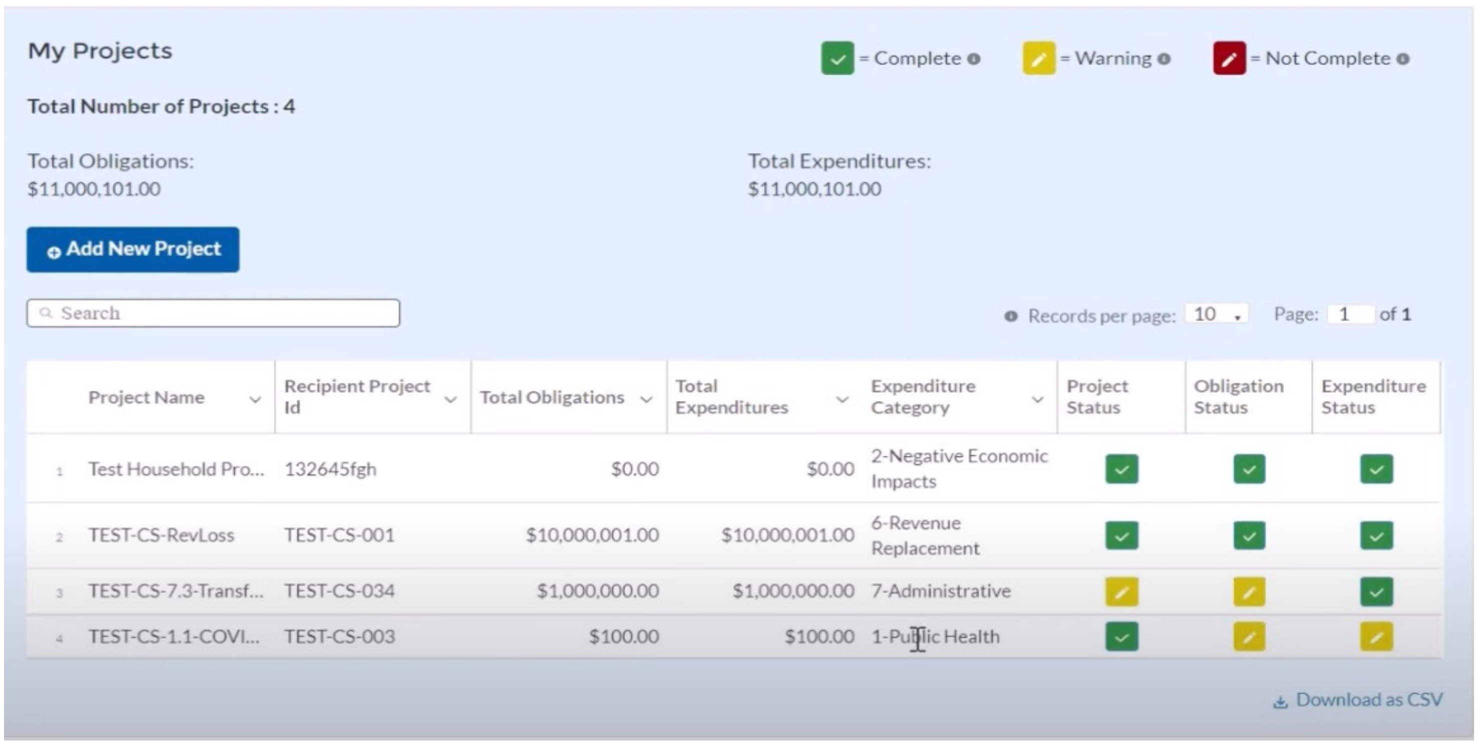


After you have added all the projects for this reporting period, they should appear in the table in the **"My Projects"** section along with any other projects enter from prior reports. Each project should have three (3) green check marks next to it showing it is complete. After all projects have been entered, click **"Next"** at the bottom of the page to advance to the "Recipient Specific" screen.



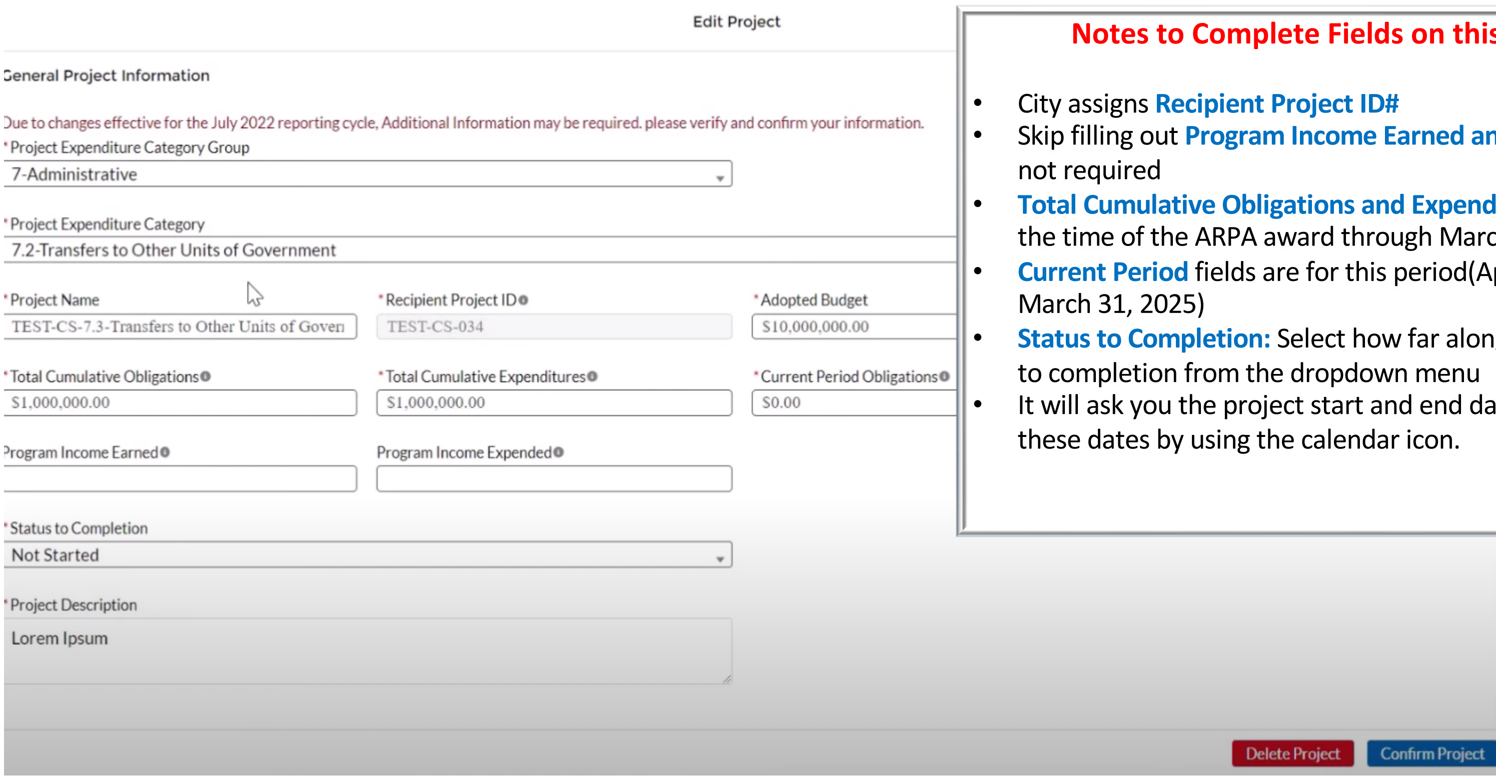
Editing an Existing Project

Yellow and Red boxes let the reporter know information needs to be edited prior to advancing in the report. To open the edit page, click on the yellow (or red) pencil. Failure to correct the data will result in an error message when you attempt to certify the report.



	Project Name	Recipient Project Id	Total Obligations	Total Expenditures	Expenditure Category	Project Status	Obligation Status	Expenditure Status
1	Test Household Pro...	132645fgh	$0.00	$0.00	2-Negative Economic Impacts			
2	TEST-CS-RevLoss	TEST-CS-001	$10,000,001.00	$10,000,001.00	6-Revenue Replacement			
3	TEST-CS-7.3-Transf...	TEST-CS-034	$1,000,000.00	$1,000,000.00	7-Administrative			
4	TEST-CS-1.1-COVI...	TEST-CS-003	$100.00	$100.00	1-Public Health			

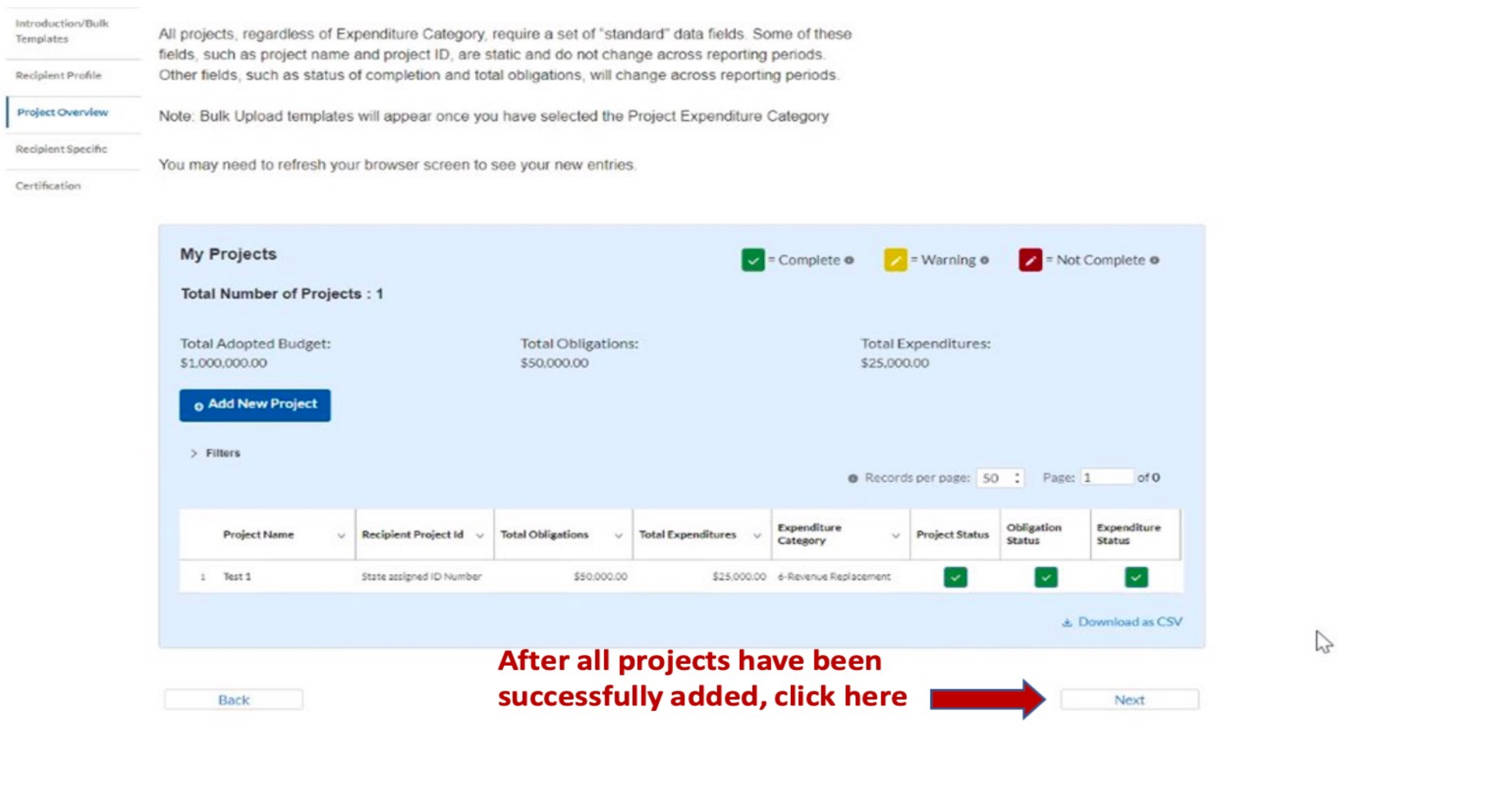
Because the standard allowance for revenue loss was elected, all reporting of ARPA expenditures will be under **Expenditure Category Group 6 – Revenue Replacement**, using **Expenditure Category 6.1 Provision of Government Services.** When you have entered all the required fields, click **"Confirm Project".** If necessary, continue adding additional projects for this reporting period (4/1/2023 – 3/31/2024).



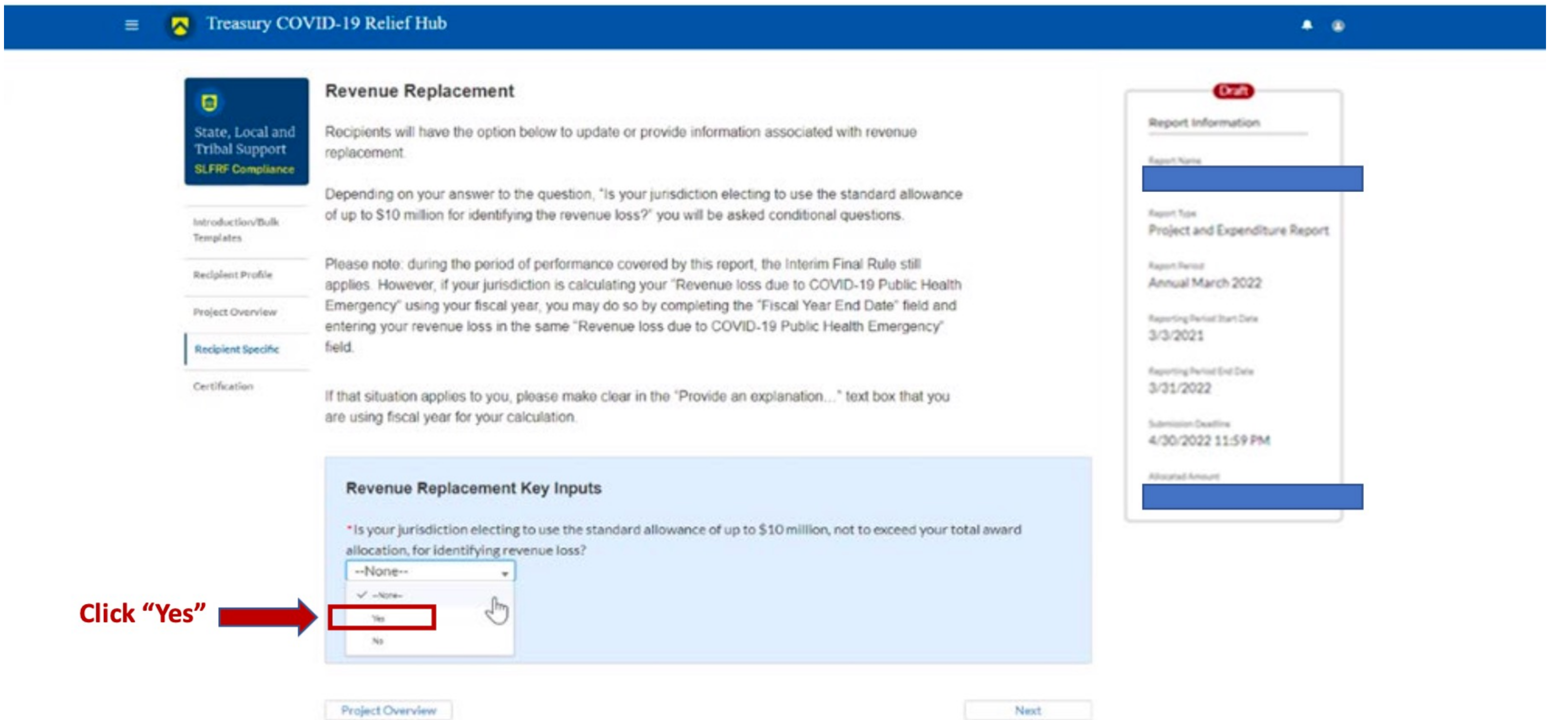
Notes to Complete Fields on this Page

- City assigns **Recipient Project ID#**
- Skip filling out **Program Income Earned and Expended**, not required
- **Total Cumulative Obligations and Expenditures** are from the time of the ARPA award through March 31, 2025
- **Current Period** fields are for this period(April 1, 2024, to March 31, 2025)
- **Status to Completion:** Select how far along the project is to completion from the dropdown menu
- It will ask you the project start and end dates. Select these dates by using the calendar icon.

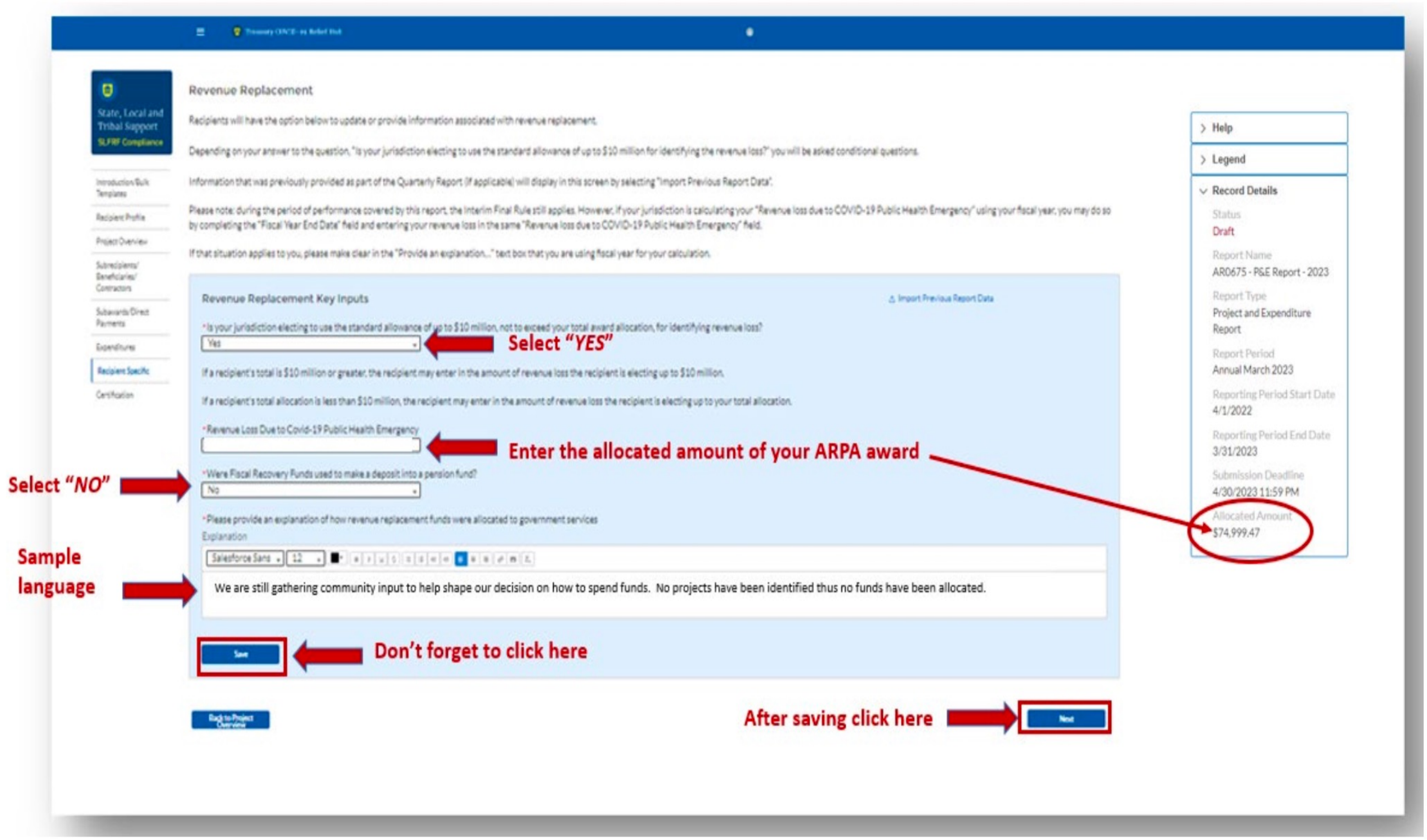
After you have added all the projects for this reporting period, they should appear in the table in the **"My Projects"** section along with any other projects enter from prior reports. Each project should have three (3) green check marks next to it showing it is complete. After all projects have been entered, click **"Next"** at the bottom of the page to advance to the "Recipient Specific" screen.



The **“Recipient Specific”** screen is the **“Revenue Replacement”** page. For the question: “Is your jurisdiction electing to use the standard allowance of up to $10 million, not to exceed your total award allocation, for identifying revenue loss?” you should answer **“Yes”.** After selecting **“Yes”** a series of conditional questions will populate.



On the **"Revenue Replacement"** page in the **"Revenue Replacement Key Inputs"** section follow the steps in **RED** below:

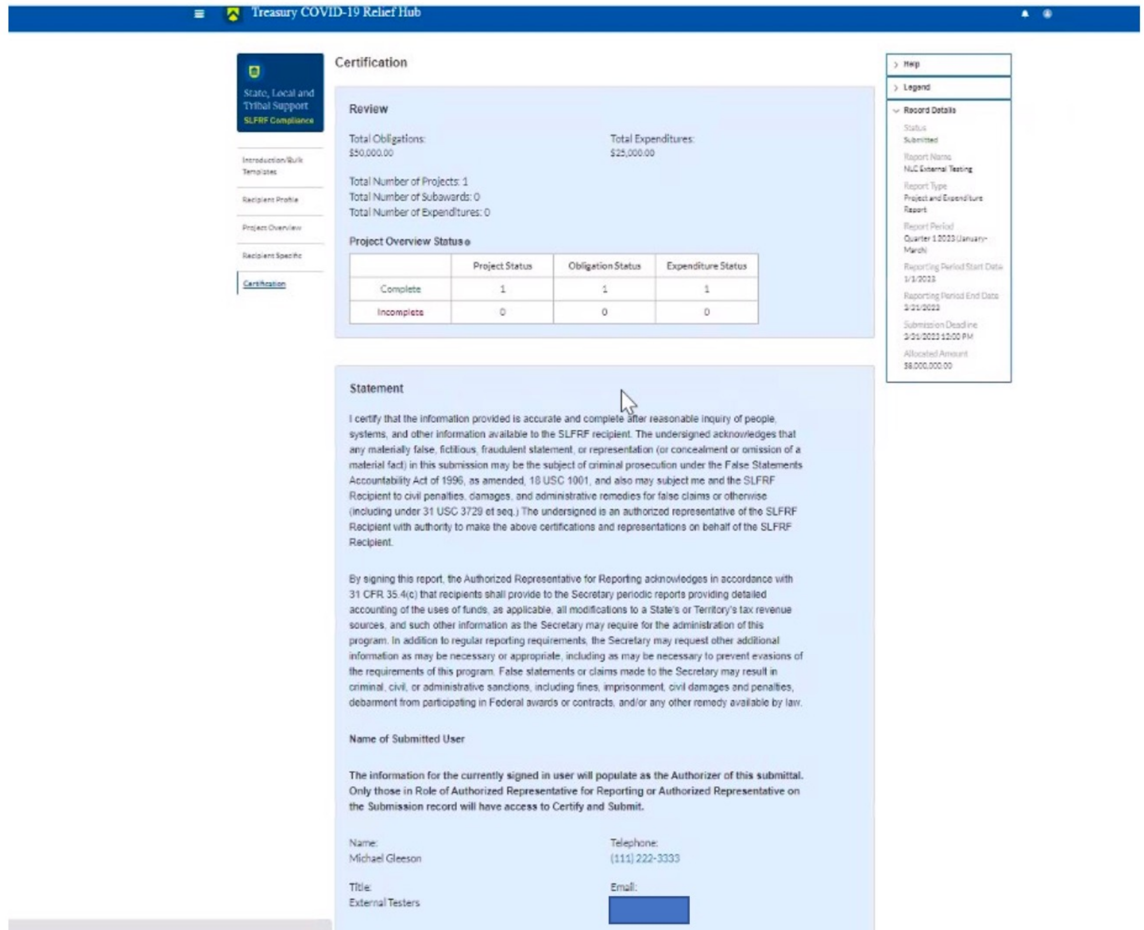


You will arrive at the **"Certification"** page. It should show the number of projects that were entered in the **"Project Overview"** table under "Complete"; zero (0) should appear under "Incomplete".

The text at the bottom also contains pre-populated information for whoever was designated to the role of **"Authorized Representative for Reporting".**

If this is not you, you will not be able to **"Certify and Submit". Only Authorized Representative for Reporting** can certify the reports.

When ready, click **"Certify and Submit"** at the bottom of the page



New to the Certification Page

Before certifying and submitting, it will ask the following:

For almost all cities, be sure to select “no” from the dropdown in these questions or it will not let you submit the report.

If have happen to be a city that has received more than $750,000 in federal grants within the last FY, answer “Yes” and understand that you will need to complete a Single Audit on the funds you received.

Federal Audit Clearinghouse (FAC)

Have you expended $750,000 or more in federal award funds during your most recently completed fiscal year?

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Alternative Compliance Examination Engagement (ACEE)

For certain entities that may be new to expending more than $750,000 in federal awards and are now subject to Single Audit Act requirements, the U.S. Department of the Treasury (Treasury), together with the Office of Management and Budget and other stakeholders, developed the Alternative Compliance Examination Engagement (ACEE).

For qualified SLFRF recipients, the ACEE is a voluntary alternative to a required full Single Audit that is less burdensome, but still upholds good stewardship by focusing on Activities Allowed and Unallowed and Allowable Cost/Cost Principles.

Would you like to submit an ACEE instead of the Single Audit?

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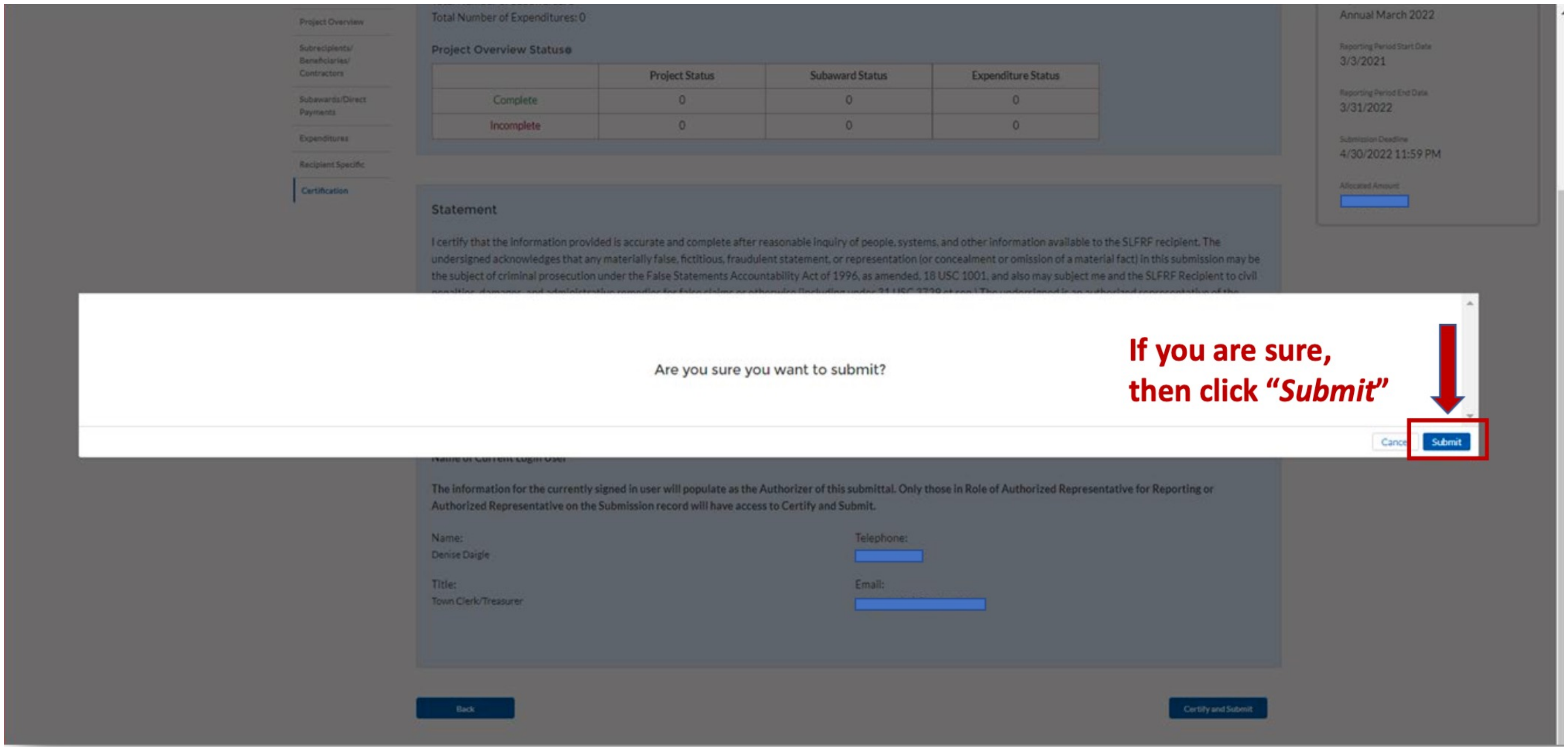
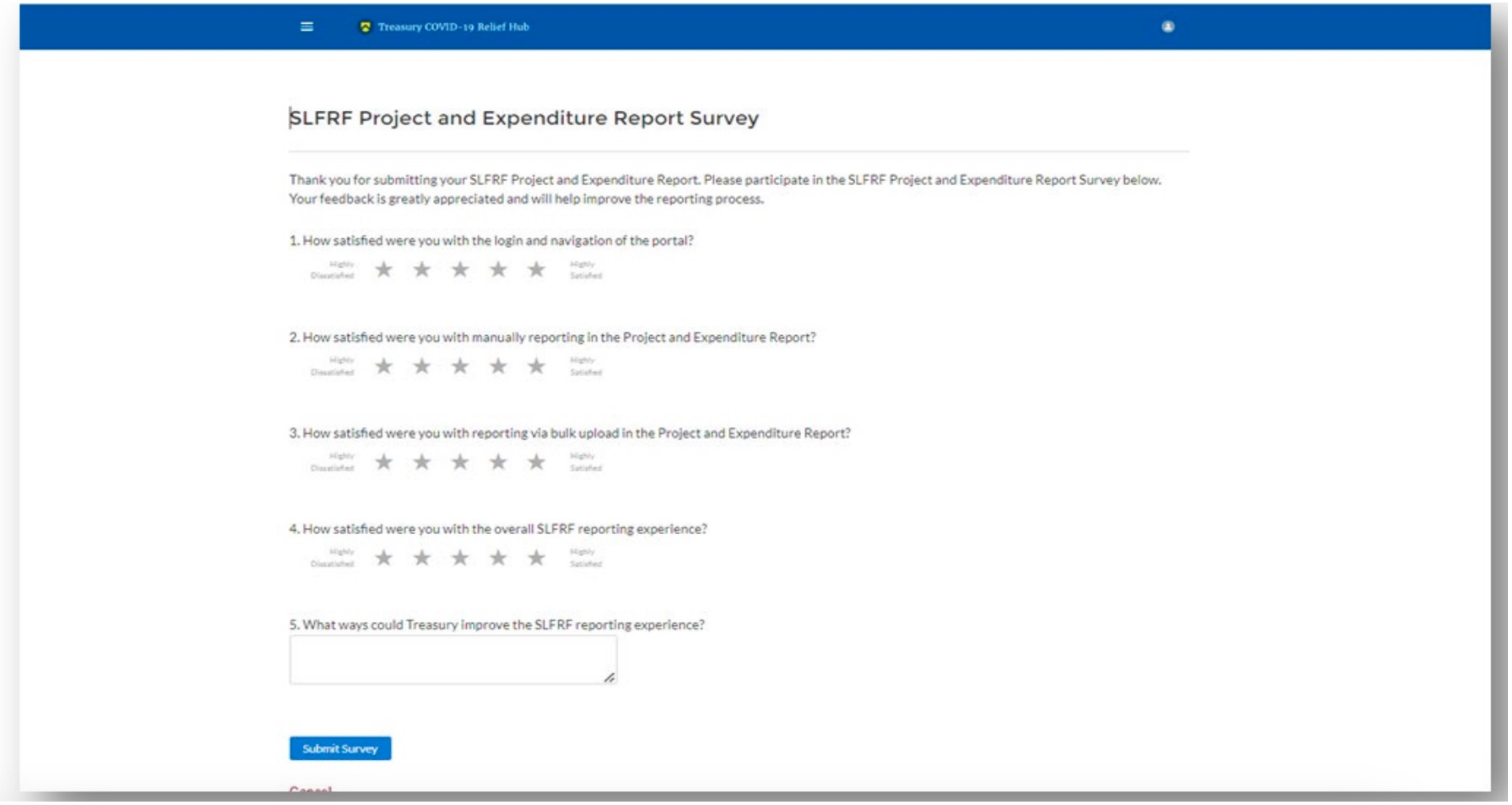
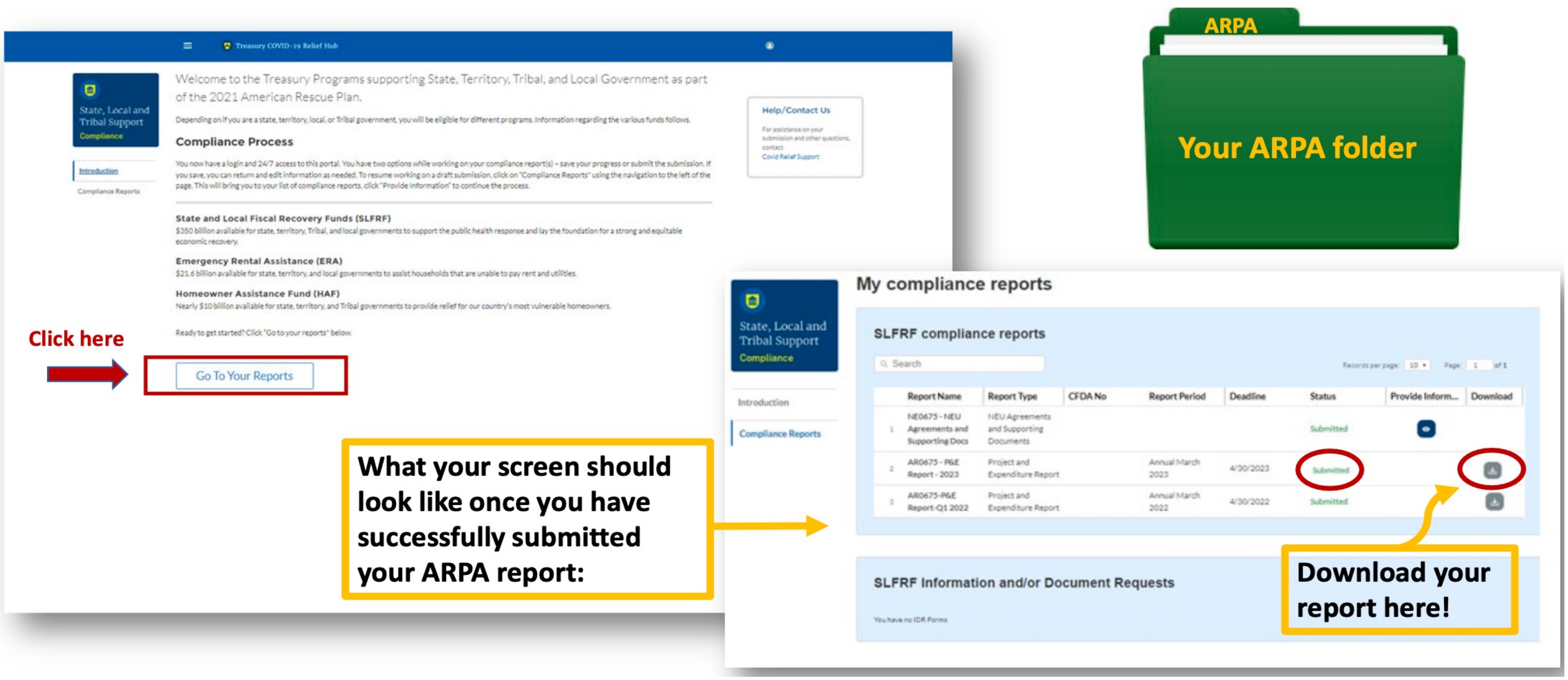
This is the message you will receive after hitting the **"Certify and Submit"** button. Click on the **"Submit"** button.



After hitting **“Submit”** you will arrive at the **“SLFRF Project and Expenditure Report Survey”** page. You can complete the Survey, but it is not a requirement. If you choose not to complete it, scroll down and select **“Cancel”**.



After the **“Survey”** page you will return to the main Portal page. As a best practice it is recommended to click on **“Go to Your Reports”** and review the **“My Compliance Reports”** page to verify that your 2024 Project and Expenditure Report shows as **“Submitted”** and download a copy of it to save to your ARPA grant file along with the reports for the prior years.



ARPA File Best Practices

Cities are required to file the report annually in April through 2027. It is recommended that more than one person has Authorized Representative for Reporting permission should the primary person be unable to file the report, or the primary person leaves their role with the city.

It is recommended to take these steps as it relates to the ARPA file:

- Put everything in your ARPA folder; if you have not created a file/folder, **CREATE ONE!**
- Write down all logins, passwords and other details for Login.gov, ID.me, and the Treasury portal
- Write down details for all assigned user roles from the Treasury portal
- Print out and put a PDF copy of each completed report you submit in your ARPA file
- Keep all records of funds spent including receipts in this folder
- Prepare a spreadsheet to track ARPA funds spent and obligated for each year and put it in this folder

Treasury Portal Assistance

There are self-service resources that can be found at this link, https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/state-and-local-fiscal-recovery-funds/slfrf-self-service-resources to help troubleshoot login difficulties and address technical issues. If the self-service options do not resolve the problem, the Department of Treasury can be contacted by emailing SLFRF@treasury.gov or by calling (844) 529-9527.

When emailing (or if calling the Department of Treasury) make sure to include the following in your email:

- Your City's Name
- UEI Number
- Federal Tax ID Number
- Your Name and Role with the City

WHAT QUESTIONS DO YOU HAVE?

Bill Goldy, Iowa League of Cities Consultant
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Mobile: (970) 222-0611

https://iowaleague.org/resource/contact-us-on-federal-funding-questions/